

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 12 C 0139
)	
ENGEL HEATING, LLC, an Illinois limited)	JUDGE GARY FEINERMAN
liability company,)	
)	
Defendant.)	

MOTION FOR ENTRY OF FINAL JUDGMENT

Plaintiffs, by and through their attorneys, default and partial judgment having been entered against the Defendant on March 1, 2012, request this Court enter final judgment against Defendant, ENGEL HEATING, LLC, an Illinois limited liability company. In support of that Motion, Plaintiffs state:

1. On March 1, 2012, this Court entered default against Defendant, partial judgment in the amount of \$37,879.08 encompassing the time period June 2011 through August 2011, and granted Plaintiffs' request for an order directing Defendant to submit its monthly fringe benefit contribution reports for the time period September 2011 through January 2012 by March 15, 2012.

2. On or about April 4, 2012, Plaintiffs' counsel received Defendant's monthly fringe benefit contribution reports for the time period January 2011 through November 2011. For the contribution months of June 2011 through November 2011, Defendant is delinquent in contributions to the Funds in the amount of \$104,466.61. (See Affidavit of Scott P. Wille).

3. Additionally, the amount of \$10,446.66 is due for liquidated damages. (Wille Aff. Par. 5).

4. In addition, Plaintiffs' firm has expended \$435.00 in costs and \$1,486.25 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of final judgment in the total amount of \$116,834.52.

WHEREFORE, Plaintiffs respectfully request this Court enter final judgment in the amount of \$116,834.52.

/s/ Jennifer L. Dunitz-Geiringer

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Final Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 23rd day of April 2012:

Mr. Terrence J. McKenna, Registered Agent
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/s/ Jennifer L. Dunitz-Geiringer

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